

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRIE DREW,	:	Civil Action
	:	
Plaintiff,	:	No. 07-813 GMS
	:	
v.	:	
	:	
CORPORATION SERVICE CO., INC.	:	
a Delaware corporation,	:	
	:	
Defendant.	:	
	:	

**DEFENDANT’S ANSWER AND
DEFENSES TO PLAINTIFF’S COMPLAINT**

Defendant Corporation Service Company (incorrectly identified in the caption of the Complaint as “Corporation Service Co., Inc.”) (“CSC” or “Company” or “Defendant”), by and through its undersigned attorneys, hereby answers the Complaint of Plaintiff Brie Drew (“Plaintiff”) in the above-captioned matter by admitting, denying, and averring as follows:

INTRODUCTION

1. Defendant admits that Plaintiff seeks damages under Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981. Defendant denies that facts exist that would allow Plaintiff to obtain relief pursuant to these laws.

JURISDICTION AND VENUE

2. Admitted.
3. Admitted.
4. Admitted.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

5. The allegations contained in paragraph 5 constitute conclusions of law to which no responsive pleading is required.

a. Defendant admits only that Plaintiff filed a charge of discrimination that bears the date of May 8, 2007. The remaining allegations constitute conclusions of law to which no responsive pleading is required.

b. Defendant admits that the EEOC issued a notice of rights that bears the date of September 19, 2007.

c. Defendant lacks knowledge or information sufficient to form a belief as to the allegations contained in sub-paragraph 5(c), and therefore, denies the same.

PARTIES

6. Paragraphs 1-5 above are incorporated by reference as if the same were fully set forth herein.

7. Defendant admits that Plaintiff is an African-American female. Defendant lacks knowledge or information sufficient to form a belief as to the allegations concerning Plaintiff's current address. By way of further response, Defendant's business records reflect that Plaintiff's last known address was 1 Westbrook Drive, Unit F-108, Woolwich, NJ 08085.

8. Admitted.

9. Admitted. By way of further response, Defendant is a leading provider of legal and financial services for many of the world's largest companies and law firms. CSC offers corporate compliance and governance services, intellectual property management and domain name management services, entity management services, public record document and retrieval services, uniform commercial code and motor vehicle titling services, litigation management, and registered agent services.

10. The allegations contained in paragraph 10 state conclusions of law to which no responsive pleading is required.

FACTUAL BACKGROUND

11. Paragraphs 1-10 above are incorporated by reference as if the same were fully set forth herein.

12. Denied. By way of further response, Plaintiff was hired on September 11, 2006.

13. Admitted.

14. Denied.

15. Denied.

16. Admitted.

17. Denied.

Count I

Violation Of Title VII of the Civil Rights Act of 1964

(Disparate Treatment/Discriminatory Termination/Hostile Work Environment)

18. Paragraphs 1-17 above are incorporated by reference as if the same were fully set forth herein.

19. Denied.

20. Denied.

Count II

Violation Of Title VII of the Civil Rights Act of 1964

(Retaliation)

21. Paragraphs 1-20 above are incorporated by reference as if the same were fully set forth herein.

22. Denied.

Count III
Violation Of 42 U.S.C. § 1981
(Disparate Treatment /Hostile Work Environment)

23. Paragraphs 1-22 above are incorporated by reference as if the same were fully set forth herein.

24. Denied.

Defendant denies all allegations contained in the Wherefore Clause of the Complaint (including its sub-parts) and denies that it is liable to Plaintiff or any other individual for any reason or in any way.

DEFENSES

1. To the extent that Plaintiff has failed to satisfy the statutory and/or jurisdictional prerequisites to the institution of an action under Title VII of the Civil Rights Act of 1964 or under any other federal or statute, her claims fail.

2. To the extent that Plaintiff failed to satisfy the applicable statutes of limitations and/or filing periods, her claims are barred.

3. To the extent that Plaintiff has failed to mitigate her damages, her claims for damages are diminished or barred.

4. Defendant's employment decisions with respect to Plaintiff were made for legitimate business reasons.

5. Defendant has in place a strong policy against discrimination and otherwise exercised reasonable care to prevent and correct promptly any discrimination, and Plaintiff unreasonably failed to take advantage of preventive and corrective opportunities and procedures provided by Defendant or to avoid harm otherwise.

6. At all relevant times, Defendant has made good faith efforts to comply with Title VII. Plaintiff's claims for punitive damages are barred by Defendant's adoption, publication and enforcement of a policy against discrimination of the type alleged in the Complaint.

RESERVATION OF RIGHTS

Defendant reserves the right to assert such additional defenses that may prove applicable during the course of this litigation.

Respectfully submitted,

January 7, 2008

/s/ Christopher A. Selzer
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	:	
Defendant.	:	
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CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2008, I electronically filed Defendant's Answer and Affirmative Defenses to the Complaint of Plaintiff Brie Drew with the Clerk of the United States District Court using its CM/EMF system, which will then electronically notify the following CM/ECF participant on this case:

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